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June 23, 2003

VIA FACSIMILE
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Christopher Johns, Esq.
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LAW
BUSINESS
TECHNOLOGY

Re: Hackley et al. v. J.M.I.X et al.; Case No. HM02CV3363
Your letter dated June 5, 2003

Dear Mr. Johns:

This letter is in response to your letter dated June 20, 2003, received by facsimile transmission in our office on Saturday June 21, 2003. Two days notice for the deposition of Richard Zambito is unreasonable notice within Federal Rule of Civil Procedure 30(b)1 and Federal District Court for the District of Maryland Discovery Guideline 8, which specifies reasonable notice as eleven days. I am not available on Tuesday June 24 or Wednesday June 25, 2003 for Mr. Zambito's deposition. If you intend to Notice Mr. Zambito's deposition, please provide reasonable notice. If you depose Mr. Zambito on June 24 or June 25, 2003 without my presence, I will have no other recourse but to file a Motion to quash the deposition. Thank you in advance for your cooperation.

Sincerely,


Deborah J. Westervelt

fyh:mjl